

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:24-cv-00228-JRG-RSP

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule 4-3, and the Court’s Docket Control Order (Dkt. 47), Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.’s. (“Samsung”) (collectively, “Parties”) respectfully submit the following Joint Claim Construction and Prehearing Statement.

I. AGREED CLAIM CONSTRUCTIONS (P.R. 4-3(a)(1))

The Parties have not agreed to any claim constructions.

II. DISPUTED CLAIM CONSTRUCTIONS (P.R. 4-3(a)(2))

The Parties’ proposed constructions of disputed terms are provided in the chart below. The Parties’ proposed constructions are also set forth in the accompanying **Exhibit A**, along with the intrinsic and extrinsic evidence on which the parties intend to rely. Each party further reserves the right to rely on evidence identified by the other party, even if not specifically identified in the column corresponding to that party.

A. U.S. Patent No. 9,609,510

Term #	Claim Term	Headwater's Proposed Construction	Samsung's Proposed Construction
1	target credential (claims 1, 2, 7, 8, 9, 10, 23, 24, 25, 26, 27, 33, 34, 35, 46, 47)	Not indefinite; plain and ordinary meaning	Indefinite

B. U.S. Patent No. 11,096,055

Term #	Claim Term	Headwater's Proposed Construction	Samsung's Proposed Construction
2	a user service interface to allow a user to make a user selection between the first and second service profiles, the connection manager to, responsive to the user selection, select an access network connection for the WWAN modem (claim 6)	Not indefinite; plain and ordinary meaning	Indefinite
3	wherein the at least one adaptive service policy control agent applies network service policies from a superset profile that provides capabilities from each of the first and second service profiles (claim 8)	Not indefinite; plain and ordinary meaning	Indefinite

C. U.S. Patent No. 11,405,429

Term #	Claim Term	Headwater's Proposed Construction	Samsung's Proposed Construction
4	secure modem subsystem (claim 1)	Not indefinite; plain and ordinary meaning	Indefinite

III. ANTICIPATED LENGTH OF TIME NEEDED FOR THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(3))

The parties estimate that up to two hours will be needed for the claim construction hearing.

The parties agree that each side will be allocated half of the total time permitted for the hearing.

IV. PROPOSED WITNESSES TO BE USED AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(4))

No party proposes to call witnesses at the claim construction hearing.

V. OTHER ISSUES TO BE ADDRESSED PRIOR TO CLAIM CONSTRUCTION HEARING (P.R. 4-3(a)(5))

The parties are not currently aware of any issues that they would propose taking up at a prehearing conference prior to the claim construction hearing.

Dated: May 16, 2025

Respectfully submitted,

/s/ Marc Fenster

/s/ Ashley A. Bolt

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Samsung Electronics America, Inc.

CERTIFICATE OF SERVICE

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Marc Fenster
Marc Fenster
Attorney for Plaintiff
Headwater Research LLC

CERTIFICATE OF CONFERENCE

I certify that that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties agree on filing this joint statement.

/s/ Marc Fenster
Marc Fenster
Attorney for Plaintiff
Headwater Research LLC